

INFORMATIONAL LETTER NO. 2071-MC-FFS

DATE: December 24, 2019

TO: Iowa Medicaid Behavioral Health Service Providers

APPLIES TO: Managed Care (MC) and Fee-for-Service (FFS)

FROM: Iowa Department of Human Services (DHS), Iowa Medicaid Enterprise (IME)

RE: Medicare Coverage for Opioid Use Disorder (OUD) Treatment Services

EFFECTIVE: January 1, 2020

Section 2005 of the SUPPORT Act establishes a new Medicare Part B benefit for OUD treatment services furnished by Opioid Treatment Programs (OTPs) on or after January 1, 2020. For dually-eligible beneficiaries who receive OTP services through Medicaid now, starting January 1, 2020, Medicare will become the primary payer for OTP services. The new current procedural terminology (CPT®) codes have been released with changes in 2020 to include CPT® codes and guidelines added for OUD treatment services furnished by OTPs. Effective January 1, 2020, the Centers for Medicare and Medicaid Services (CMS) will pay OTPs through bundled payments for OUD treatment services in an episode of care provided to people with Medicare Part B.

OTPs intending to provide treatment to Medicare beneficiaries beginning January 1, 2020, must:

- Be a Medicare-enrolled OTP
- Have in effect a certification by the Substance Abuse and Mental Health Services Administration (SAMHSA)
- Be accredited by an accrediting body approved by SAMHSA

Providers not currently enrolled with Medicare should begin enrolling now. Medicare enrollment materials may be accessed online at:

<https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/MedicareProviderSupEnroll/EnrollmentApplications>

Medicare has also published a Frequently Asked Questions Webpage, which may be accessed online at: <https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/Opioid-Treatment-Program/OTP-FAQs>

The new Medicare benefit will cover OUD treatment services including:

- (1) Opioid agonist and antagonist treatment medications approved by the Food and Drug Administration (FDA) for treatment of OUD;
- (2) Dispensing and administration of such medications;
- (3) Substance use counseling, including counseling furnished via two-way interactive
- (4) Audio-video communication technology;
- (5) Individual and group therapy, including those furnished via two-way interactive audio video communication technology; and toxicology testing, including both presumptive and definitive testing. The payment rates assume beneficiaries receive an average of two presumptive and one definitive test per month.

G2067	Medication assisted treatment, methadone; weekly bundle including dispensing and/or administration, substance use counseling, individual and group therapy, and toxicology testing, if performed (provision of the services by a Medicare-enrolled OTP).
G2068	Medication assisted treatment, buprenorphine (oral); weekly bundle including dispensing and/or administration, substance use counseling, individual and group therapy, and toxicology testing if performed (provision of the services by a Medicare-enrolled OTP).
G2069	Medication assisted treatment, buprenorphine (injectable); weekly bundle including dispensing and/or administration, substance use counseling, individual and group therapy, and toxicology testing if performed (provision of the services by a Medicare-enrolled OTP). (+This code should be billed only during the week that the drug is administered. HCPCS code G2074, which describes a bundle not including the drug, would be billed during any subsequent weeks that at least one non-drug service is furnished until the injection is administered again, at which time HCPCS code G2069 would be billed again for that week.)
G2070	Medication assisted treatment, buprenorphine (implant insertion); weekly bundle including dispensing and/or administration, substance use counseling, individual and group therapy, and toxicology testing if performed (provision of the services by a Medicare-enrolled OTP).
G2071	Medication assisted treatment, buprenorphine (implant removal); weekly bundle including dispensing and/or administration, substance use counseling, individual and group therapy, and toxicology testing if performed (provision of the services by a Medicare-enrolled OTP).
G2072	Medication assisted treatment, buprenorphine (implant insertion and removal); weekly bundle including dispensing and/or administration, substance use counseling, individual and group therapy, and toxicology testing if performed (provision of the services by a Medicare enrolled OTP).

G2073	Medication assisted treatment, naltrexone; weekly bundle including dispensing and/or administration, substance use counseling, individual and group therapy, and toxicology testing if performed (provision of the services by a Medicare-enrolled OTP).
G2074	Medication assisted treatment, weekly bundle not including the drug, including substance use counseling, individual and group therapy, and toxicology testing if performed (provision of the services by a Medicare-enrolled OTP)
G2075	Medication assisted treatment, medication not otherwise specified; weekly bundle including dispensing and/or administration, substance use counseling, individual and group therapy, and toxicology testing, if performed (provision of the services by a Medicare-enrolled OTP).

Intensity Add-on Codes

The medical services described by these add-on codes could be furnished by a program physician, a primary care physician or an authorized healthcare professional under the supervision of a program physician or qualified personnel such as nurse practitioners and physician assistants. The other assessments, including psychosocial assessments could be furnished by practitioners who are eligible to do so under their state law and scope of licensure.

G2076	Intake activities, including initial medical examination that is a complete, fully documented physical evaluation and initial assessment conducted by a program physician or a primary care physician, or an authorized healthcare professional under the supervision of a program physician or qualified personnel that includes preparation of a treatment plan that includes the patient's short-term goals and the tasks the patient must perform to complete the short-term goals; the patient's requirements for education, vocational rehabilitation, and employment; and the medical, psycho- social, economic, legal, or other supportive services that a patient needs, conducted by qualified personnel (provision of the services by a Medicare enrolled OTP); List separately in addition to code for primary procedure.
G2077	Periodic assessment; assessing periodically by qualified personnel to determine the most appropriate combination of services and treatment (provision of the services by a Medicare-enrolled Opioid Treatment Program); List separately in addition to code for primary procedure.
G2078	Take-home supply of methadone; up to 7 additional day supply (provision of the services by a Medicare-enrolled OTP); List separately in addition to code for primary procedure. (SAMHSA allows a maximum take-home supply of one month of medication; therefore, CMS does not expect the add-on codes describing take-home doses of methadone and oral buprenorphine to be billed more than 3 times in one month (in addition to the weekly bundled payment))

G2079	Take-home supply of buprenorphine (oral); up to 7 additional day supply (provision of the services by a Medicare-enrolled OTP); List separately in addition to code for primary procedure. (+ SAMHSA allows a maximum take-home supply of one month of medication; therefore, CMS does not expect the add-on codes describing take-home doses of methadone and oral buprenorphine to be billed more than 3 times in one month (in addition to the weekly bundled payment).
G2080	Each additional 30 minutes of counseling or group or individual therapy in a week of medication assisted treatment, (provision of the services by a Medicare enrolled OTP); List separately in addition to code for primary procedure.

It is likely that not all OTP providers will have completed the Medicare enrollment process and will not have the ability to bill Medicare by January 1, 2020. In an effort to prevent any disruption in OTP treatment for dually eligible beneficiaries, Iowa Medicaid is issuing this IL to clarify that Medicaid payments will continue at this time. Additional guidance will be issued regarding coordination of benefits.

If you have questions, please contact the IME Provider Services Unit at 1-800-338-7909 or by email at imeproviderservices@dhs.state.ia.us.